

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

07 - 20259 CR-UNGARO
Case No.

18 U.S.C. § 1349
18 U.S.C. § 1347
18 U.S.C. § 371
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 982
18 U.S.C. § 2

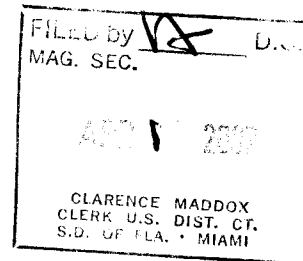
MAGISTRATE JUDGE
O'SULLIVAN

UNITED STATES OF AMERICA

vs.

**JORGE MARIANO HERNANDEZ,
MARTA SAAVEDRA,
TANIA MICHEL,
and
VICTOR GERMAN SUASNAVAS,**

Defendants.



INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times relevant to this Indictment:

The Medicare Program

1. The Medicare Program ("Medicare") was a federally funded program that provided free or below-cost health care benefits to certain individuals, primarily the elderly, blind, and disabled. The benefits available under Medicare were governed by federal statutes and regulations.

The United States Department of Health and Human Services (“HHS”), through its agency, the Centers for Medicare and Medicaid Services (“CMS”), oversaw and administered Medicare. Individuals who received benefits under Medicare were commonly referred to as Medicare “beneficiaries.”

2. Medicare was a “health care benefit program,” as defined by Title 18, United States Code, Section 24(b).

3. Part B of the Medicare Program was a medical insurance program that covered, among other things, certain physician and outpatient services, and other health care benefits, items, and services, including durable medical equipment (“DME”), that were medically necessary and ordered by licensed medical doctors or other qualified health care providers. DME is equipment that is designed for a specific medical purpose and for repeated use, such as wound care supplies, knee braces, prosthetic limbs, back braces, wrist braces, and wheelchairs.

4. For Florida Medicare beneficiaries, Palmetto Government Benefits Administrators (“Palmetto GBA”), had a contract with HHS to receive, process and pay claims by Medicare beneficiaries for reimbursement for the cost of DME and related health care benefits, items, or services supplied or provided to such beneficiaries.

Medicare Billing and Payment Procedures

5. A DME company that sought to participate in Medicare Part B and bill Medicare for the cost of DME and related benefits, items, and services was required to apply for and receive a “supplier number.” The supplier number allowed a DME company to submit bills, known as “claims,” to Medicare to obtain reimbursement for the cost of DME and related health care benefits, items, and services that a DME company had supplied or provided to beneficiaries.

6. To receive payment from Medicare, a DME company, using its supplier number, would submit a health insurance claim form, known as a CMS-1500. Medicare permitted DME companies to submit a CMS-1500 electronically or by way of a paper claim form. Each claim form required certain important information, including: (a) the Medicare beneficiary's name and identification number; (b) the identification number of the doctor or other qualified health care provider who ordered the health care benefit, item, or service that was the subject of the claim; (c) the health care benefit, item, or service that was provided or supplied to the beneficiary; (d) the billing codes for the benefit, item, or service; and (e) the date upon which the benefit, item, or service was provided or supplied to the beneficiary.

7. Medicare, through Palmetto GBA, generally would pay a substantial portion of the cost of the DME or related health care benefits, items, and services that were medically necessary and ordered by licensed doctors or other qualified health care providers.

JT & M Medical Services, Inc.

8. JT & M Medical Services, Inc. ("JT & M") was a Florida corporation that was incorporated on or about June 21, 2004. Through on or about October 19, 2006, when a request was submitted to the State of Florida to dissolve the corporation, JT & M was located in Miami-Dade County.

9. JT & M obtained Medicare supplier number 5325120001 in or around February 2005 and was thus authorized to submit claims to Medicare for DME benefits, items, and services. From in or around March 2005 through in or around June 2006, JT & M submitted approximately \$3,687,774 in claims to Medicare, seeking reimbursement for DME benefits, items, and services that JT & M supposedly had provided to Medicare beneficiaries. In response to these claims, Medicare paid JT & M approximately \$1,577,233.

The Defendants

10. Defendant **JORGE MARIANO HERNANDEZ**, a Miami-Dade County resident, controlled the activities of JT & M.

11. Defendant **MARTA SAAVEDRA**, a Miami-Dade County resident, was **JORGE MARIANO HERNANDEZ**'s wife and helped him control the activities of JT & M.

12. Defendant **TANIA MICHEL**, a Miami-Dade County resident, was the "straw," or nominal, owner of JT & M. **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** supervised and gave directions to **TANIA MICHEL** concerning the activities of JT & M.

13. Defendant **VICTOR GERMAN SUASNAVAS**, a Miami-Dade County resident, owned Oxygen & Medical Services, Inc. ("Oxygen & Medical Services"), a Florida corporation located in Miami-Dade County, Florida. Oxygen & Medical purportedly sold medical equipment to JT & M.

COUNT 1
CONSPIRACY TO COMMIT HEALTH CARE FRAUD
(18 U.S.C. § 1349)

1. Paragraphs 1 through 13 of the General Allegations section of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or around June 2004, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

JORGE MARIANO HERNANDEZ,
MARTA SAAVEDRA,
and
TANIA MICHEL,

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury, to violate Title 18, United States Code, Section 1347, that is, to execute a scheme and artifice to defraud a health care benefit program affecting commerce, as defined in Title 18, United States Code, Section 24(b), that is, Medicare, and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, said health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services.

Purpose of the Conspiracy

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unlawfully enrich themselves by, among other things: (a) submitting or causing the submission of false and fraudulent claims to Medicare; (b) paying or causing the payment of kickbacks and bribes to Medicare beneficiaries and patient recruiters to further the Medicare billing fraud scheme; (c)

concealing the submission of false and fraudulent Medicare claims; and/or (d) diverting fraud proceeds for the personal use and benefit of the defendants and others.

Manner and Means Used to Accomplish the Conspiracy

The manner and means by which the defendants and their co-conspirators sought to accomplish the object and purpose of the conspiracy included, but were not limited to, the following:

4. **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** directed **TANIA MICHEL** to incorporate JT & M and serve as JT & M's president and owner.

5. **JORGE MARIANO HERNANDEZ**, **MARTA SAAVEDRA**, and other co-conspirators paid and caused the payment of kickbacks or bribes to Medicare beneficiaries and patient recruiters to obtain patients and patient information in order to submit false and fraudulent Medicare claims on behalf of JT & M.

6. **JORGE MARIANO HERNANDEZ**, **MARTA SAAVEDRA**, and **TANIA MICHEL** submitted or caused the submission of numerous false and fraudulent Medicare claims for reimbursement for the cost of DME-related items and services that supposedly had been provided by JT & M to Medicare beneficiaries. The claims were false and fraudulent because: the doctors who allegedly ordered the DME items and services had not seen the Medicare beneficiaries; the doctors had not ordered the items and services; and/or the DME items and services had not been provided to the Medicare beneficiaries. As a result of the submission of such false and fraudulent claims, Medicare paid JT & M approximately \$1,577,233.

7. To create the illusion that JT & M had purchased the DME items and services that it supposedly was providing to Medicare beneficiaries, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** caused the creation of invoices that falsely stated that Oxygen & Medical Services and at least one other South Florida company had sold medical equipment and supplies to JT & M.

8. To enrich themselves and to conceal or disguise proceeds of the billing fraud scheme, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** caused the preparation of numerous checks, drawn on JT & M's bank accounts, and made payable to **TANIA MICHEL** and Oxygen & Medical Services, among others, for the payment of supposed business expenses of JT & M, expenses which, for the most part, were fabricated. At the direction of **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA**, **TANIA MICHEL** and others cashed numerous checks, keeping some of the money and returning the rest to **HERNANDEZ** and **SAAVEDRA**.

COUNTS 2-7
HEALTH CARE FRAUD
(18 U.S.C. §§ 1347 and 2)

1. Paragraphs 1 through 13 of the General Allegations section of this Indictment are realleged and incorporated as though fully set forth herein.

2. From in or around June 2004, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

JORGE MARIANO HERNANDEZ
and
MARTA SAAVEDRA,

in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, a scheme and artifice to defraud Medicare,

a health care benefit program affecting commerce, as defined by Title 18, United States Code, Section 24(b), and to obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, Medicare, that is, the defendants caused JT & M Medical Services, Inc. to submit false and fraudulent claims to Medicare, seeking reimbursement for the cost of various DME items and services.

Purpose of the Scheme and Artifice

3. It was the purpose of the scheme and artifice for the defendants and their accomplices to unlawfully enrich themselves by, among other things: (a) submitting or causing the submission of false and fraudulent claims to Medicare; (b) paying or causing the payment of kickbacks and bribes to Medicare beneficiaries and patient recruiters to further the Medicare billing fraud scheme; (c) concealing the submission of false and fraudulent Medicare claims; and/or (d) diverting fraud proceeds for the personal use and benefit of the defendants and others.

The Scheme and Artifice

4. The allegations in paragraphs 4 through 8 of the Manner and Means section of Count 1 of this Indictment are realleged and incorporated by reference as though fully set forth herein as a description of the scheme and artifice.

Acts in Execution or Attempted Execution of the Scheme and Artifice

5. On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA**, in connection with the delivery of and payment for health care benefits, items, and services, did knowingly and willfully execute, and attempt to execute, the above-described scheme and artifice to defraud a health care benefit program affecting commerce, that is Medicare, and to

obtain, by means of materially false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of said health care benefit program:

Count	Medicare Beneficiary	Approx. Date of Claim	Medicare Claim Number	Item Claimed; Approx. Amount Claimed
2	T.H.	09/09/2005	105252725478000	Powered pressure-reducing air mattress (E0277); \$417.05.
3	D.L.	10/04/2005	105277781150000	Powered pressure-reducing air mattress (E0277); \$417.05.
4	M.M.	10/05/2005	105278788672000	Powered pressure-reducing air mattress (E0277); \$556.06.
5	W.C.	05/19/2006	106139736655000	Collagen dressing greater than 48 square inches (A6023); \$5,480.64.
6	M.S.	05/24/2006	106144768584000	Collagen dressing greater than 48 square inches (A6023); \$13,701.60.
7	J.R.	05/24/2006	106144768641000	Collagen dressing between 6 and 48 square inches (A6022); \$1,513.44.

In violation of Title 18, United States Code, Sections 1347 and 2.

COUNT 8
CONSPIRACY TO OBSTRUCT JUSTICE
(18 U.S.C. § 371)

1. From in or around November 2006, and continuing through in or around January 2007, in Miami-Dade County, in the Southern District of Florida, the defendants,

JORGE MARIANO HERNANDEZ
and
MARTA SAAVEDRA,

did willfully, that is, with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other:

(A) to violate Title 18, United States Code, Section 1503, by knowingly and corruptly endeavoring to influence, obstruct, and impede the due administration of justice; and

(B) to violate Title 18, United States Code, Section 1512(b), by knowingly and corruptly persuading, and attempting to corruptly persuade, another person, and engaging in misleading conduct toward another person, with the intent to: (1) influence, delay, and prevent the testimony of any person in an official proceeding; (2) cause and induce any person to withhold testimony from an official proceeding; and (3) hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense.

Purpose of the Conspiracy

2. It was the purpose of the conspiracy for **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** to thwart and impede a Federal criminal investigation, which included Federal grand jury proceedings, by withholding and falsifying evidence concerning JT & M's

activities and attempting to persuade witnesses to make false statements, including the providing of false testimony to a Federal grand jury.

Manner and Means of the Conspiracy

The manner and means by which **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** sought to accomplish the objects and purpose of the conspiracy included, among others, the following:

3. **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** caused business records of JT & M to be destroyed.
4. **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** told witnesses, including T.M., to lie about the activities of JT & M and, among other things, to conceal the true nature of **HERNANDEZ's** and **SAAVEDRA's** involvement with JT & M.
5. Knowing that T.M. had been subpoenaed to testify before a Federal grand jury that was investigating JT & M's activities, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** directed T.M. to give false testimony and discussed with T.M. the probable testimony of at least one other grand jury witness.

Overt Acts

In furtherance of the conspiracy and to accomplish its objects and purpose, at least one of the conspirators committed, or caused to be committed, in the Southern District of Florida, at least one of the following overt acts, among others:

1. On or about November 28, 2006, knowing that T.M. had been subpoenaed to testify and produce records of JT & M to a Federal grand jury, **MARTA SAAVEDRA** told T.M. that **SAAVEDRA** had shredded JT & M records.

2. On or about November 28, 2006, **MARTA SAAVEDRA** and **JORGE MARIANO HERNANDEZ** told T.M. to say that T.M. had destroyed JT & M's records.

3. On or about November 29, 2006, knowing that M.H. had been subpoenaed to the Grand Jury, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** discussed with T.M. what M.H. would say to the Grand Jury about medical billing records concerning JT & M.

4. On or about November 29, 2006, **MARTA SAAVEDRA** and **JORGE MARIANO HERNANDEZ** discussed with T.M. a false story that they told T.M. to say, that is, that T.M. had received patients and business for JT & M from a woman named "Karen Ross."

5. On or about January 15, 2007, **JORGE MARIANO HERNANDEZ** and **MARTA SAAVEDRA** discussed with T.M. the upcoming grand jury testimony of M.H., advising that M.H. would tell the Grand Jury that T.M. had provided M.H.'s billing company with documents concerning JT & M.

6. On or about January 15, 2007, **MARTA SAAVEDRA** told T.M. to falsely state that T.M. had made cash purchases of equipment for JT & M.

7. On or about January 15, 2007, **JORGE MARIANO HERNANDEZ** told T.M. to falsely state that T.M. had purchased equipment from some companies without having contracts with them.

All in violation of Title 18, United States Code, Section 371.

COUNT 9
(CONSPIRACY TO COMMIT MONEY LAUNDERING: 18 U.S.C. § 1956(h))

1. A “currency transaction report” (“CTR”) is a report that is filled out on a United States Department of Treasury (“Treasury”) Fincen Form 104. A domestic financial institution is required by Federal law to file a CTR with Treasury for each financial transaction that involves United States currency of more than \$10,000. Such financial transactions include deposits, withdrawals, or exchanges of currency, or other transactions involving the physical transfer of currency from one person to another.

2. From in or around March 2005, and continuing through in or around October 2006, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**JORGE MARIANO HERNANDEZ,
MARTA SAAVEDRA,
and
VICTOR GERMAN SUASNAVAS,**

did willfully, that is, with the intent to further the object of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with a person known to the Grand Jury:

(A) to violate Title 18, United States Code, Section 1956(a)(1)(B)(i), that is, to knowingly conduct a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in such financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity; and

(B) to violate of Title 18, United States Code, Section 1956(a)(1)(B)(ii), that is, to knowingly conduct a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in such financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to avoid a transaction reporting requirement under Federal law.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 10-13
(MONEY LAUNDERING: 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)

On or about the dates set forth as to each count below, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

JORGE MARIANO HERNANDEZ
and
MARTA SAAVEDRA,

did knowingly conduct and attempt to conduct a financial transaction involving the proceeds of specified unlawful activity, knowing that the property involved in such financial transaction represented the proceeds of some form of unlawful activity, and knowing that such transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

Count	Approximate Date of Transaction	Description of Financial Transaction
10	12/06/2005	The cashing of check number 1055, in the amount of \$9,800, made payable to T.M., and drawn on JT & M's SunTrust bank account number xxxxxxxxxx3184.
11	01/10/2006	The cashing of check number 1073, in the amount of \$9,800, made payable to T.M., and drawn on JT & M's SunTrust Bank account number xxxxxxxxxx3184.
12	06/29/2006	The cashing of check number 1014, in the amount of \$5,435.75, made payable to Oxygen & Medical, and drawn on JT & M's Banco Popular account number xxxxxxx9377.
13	07/12/2006	The cashing of check number 1042, in the amount of \$3,645.25, made payable to Oxygen & Medical, and drawn on JT & M's Banco Popular account number xxxxxxx9377.

It is further alleged that the specified unlawful activity is health care fraud, in violation of Title 18, United States Code, Section 1347.

In violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE
(18 U.S.C. § 982)

1. The allegations of Counts 1 through 7 and 9 through 13 of this Indictment are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendants have an interest, pursuant to the provisions of Title 18, United States Code, Sections 982(a)(1) and 982(a)(7) and the procedures set forth in Title 21, United States Code, Section 853.

2. Upon conviction of any violation of Title 18, United States Code, Section 1349 or Title 18, United States Code, Section 1347, as alleged in Counts 1 through 7, the defendants shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, pursuant to Title 18, United States Code, Section 982(a)(7).

3. Upon conviction of any violation of Title 18, United States Code, Section 1956, as alleged in Counts 9 through 13, the defendants shall forfeit to the United States any property real or personal, involved in such offense or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

4. The property which is subject to forfeiture, includes but is not limited to the following:

(A) a money judgment in the amount of \$1,577,233, which represents the gross proceeds of the fraud;

(B) Bank accounts:

(1) all of the funds on deposit and interest accrued thereto in Banco Popular account number xxxxxx9377, in the name of JT & M Medical Services, Inc.;

(2) all of the funds on deposit and interest accrued thereto in Banco Popular account number xxxxxx4011, in the name of **TANIA MICHEL**;

(3) all of the funds on deposit and interest accrued thereto in Banco Popular account number xxxxxx6894, in the name of **TANIA MICHEL**; and

(4) all of the funds on deposit and interest accrued thereto in Bank of America account number xxxxxx3419, in the name of **TANIA MICHEL**.

5. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by reference by Title 18, United States Code, Section 982(b), if any of the forfeitable property, or any portion thereof, as a result of any act or omission of the defendants:

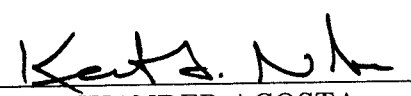
- (A) cannot be located upon the exercise of due diligence;
- (B) has been transferred, or sold to, or deposited with a third party;
- (C) has been placed beyond the jurisdiction of the Court;
- (D) has been substantially diminished in value; or
- (E) has been commingled with other property which cannot be subdivided without difficulty;

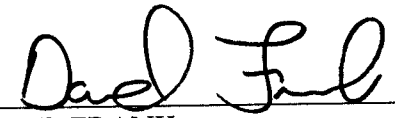
it is the intent of the United States to seek the forfeiture of other property of the defendants up to the value of the above-described forfeitable property.

All pursuant to Title 18, United States Code, Sections 982(a)(1) and 982(a)(7), and the procedures set forth at Title 21, United States Code, Section 853.

A TRUE BILL,


FOREPERSON


R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY


DAVID FRANK
ASSISTANT U.S. ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

JORGE MARIANO HERNANDEZ, et al.,

Defendants.

Superseding Case Information:**Court Division:** (Select One)

X Miami _____ Key West _____
 _____ FTL _____ WPB _____ FTP _____

New Defendant(s) _____
 Number of New Defendants _____
 Total number of counts _____

Yes _____ No _____

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) Yes
 List language and/or dialect Spanish

4. This case will take 6 days for the parties to try.

5. Please check appropriate category and type of offense listed below:
 (Check only one) (Check only one)

I	0 to 5 days	_____	Petty	_____
II	6 to 10 days	<u>X</u>	Minor	_____
III	11 to 20 days	_____	Misdem.	<u>X</u>
IV	21 to 60 days	_____	Felony	_____
V	61 days and over	_____		

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:
 Judge: _____ Case No. _____
 (Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) No
 If yes:
 Magistrate Case No. _____
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of _____
 Defendant(s) in state custody as of _____
 Rule 20 from the _____ District of _____


Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the U.S. Attorney's Office prior to April 1, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? _____ Yes X No
 If yes, was it pending in the Central Region? _____ Yes _____ No

9. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

10. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? _____ Yes X No


 DAVID FRANK
 ASSISTANT UNITED STATES ATTORNEY
 COURT ID #A5500486

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JORGE MARIANO HERNANDEZ

Case No: _____

Count #: 1
Conspiracy to Commit Health Care Fraud

18 U.S.C. § 1349

*** Max. Penalty:** 10 years' imprisonment

Counts #: 2-7
Health Care Fraud

18 U.S.C. § 1347

***Max. Penalty:** 10 years' imprisonment per count

Count #: 8
Conspiracy to Obstruct Justice

18 U.S.C. § 371

***Max. Penalty:** 5 years' imprisonment

Count #: 9
Conspiracy to Commit Money Laundering

18 U.S.C. § 1956(h)

***Max. Penalty:** 20 years' imprisonment

Counts #: 10-13
Money Laundering

18 U.S.C. § 1956(a)(1)(B)(i)

***Max. Penalty:** 20 years' imprisonment per count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: MARTA SAAVEDRA

Case No: _____

Count #: 1
Conspiracy to commit Health Care Fraud

18 U.S.C. § 1349

*** Max. Penalty:** 10 years' imprisonment

Counts #: 2-7
Health Care Fraud

18 U.S.C. § 1347

***Max. Penalty:** 10 years' imprisonment per count

Count #: 8
Conspiracy to Obstruct Justice

18 U.S.C. § 371

***Max. Penalty:** 5 years' imprisonment

Count #: 9
Conspiracy to commit Money Laundering

18 U.S.C. § 1956(h)

***Max. Penalty:** 20 years' imprisonment

Counts #: 10-13
Money Laundering

18 U.S.C. § 1956(a)(1)(B)(i)

***Max. Penalty:** 20 years' imprisonment per count

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TANIA MICHEL

Case No: _____

Count #: 1

Conspiracy to commit Health Care Fraud

18 U.S.C. § 1349

* Max. Penalty: 10 years' imprisonment

Count #: _____

*Max. Penalty: _____

Count #: _____

*Max. Penalty: _____

Count #: _____

*Max. Penalty: _____

Count #: _____

*Max. Penalty: _____

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: VICTOR GERMAN SUASNAVAS

Case No: _____

Count #: 9
Conspiracy to commit Money Laundering

18 U.S.C. § 1956(h)

* Max. Penalty: 20 years' imprisonment

Count #:

*Max. Penalty: _____

Count #:

*Max. Penalty: _____

Count #:

*Max. Penalty: _____

Count #:

*Max. Penalty: _____

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.